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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,) Case No.:2:16-mj-00708-PAL
)
Plaintiff,)
)
vs.) STIPULATION TO CONTINUE
JOSEPH ANTHONY SULLIVAN,) BENCH TRIAL
) (Second Request)
Defendant.)
)

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Jared Grimmer, Assistant United States Attorney, counsel for the United States of America, and Kristina Wildeveld, Esquire, counsel for defendant, that the bench trial in the above-captioned matter, currently scheduled for January 25, 2017, at the hour of 9:00 a.m., be vacated and continued for thirty (30) days or to a date and time convenient to the Court.

This stipulation is entered into for the following reasons:

1. The parties are still in the process of negotiating a resolution of the case that would obviate the need for trial. The parties need additional time to do so.

2. Defendant is out of federal custody and agrees to the continuance.

3. Denial of this request for a trial continuance would prejudice both the Defendants and the Government and unnecessarily consume this Court's valuable resources, taking into account the exercise of due diligence.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. The additional time requested by this stipulation, is excludable in computing the time within which the defendant must be indicted and the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(b) and 3161(h)(8)(A), considering the factors under 18 U.S.C. § 3161(h)(8)(B)(I) and (iv).

6. This is the second request for continuance of the trial in this case.

DATED this 24th day of January, 2017.

Respectfully submitted,

DANIEL G. BOGDEN
United States Attorney

/s/ Kristina Wildeveld
KRISTINA WILDEVELD, ESQ.
Counsel for defendant
JOSEPH ANTHONY SULLIVAN

/s/ Jared Grimmer
JARED GRIMMER
Assistant United States Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Based on the pending stipulation of counsel, and good cause appearing therefore,

IT IS HEREBY ORDERED that the bench trial in the above-captioned matter currently scheduled for January 25, 2017, at the hour of 9:00 a.m., be vacated and continued to

March 1, 2017, at the hour of 8:45 a.m.

DATED this 25th day of January, 2017.

Terry A. Jeen
UNITED STATES MAGISTRATE JUDGE